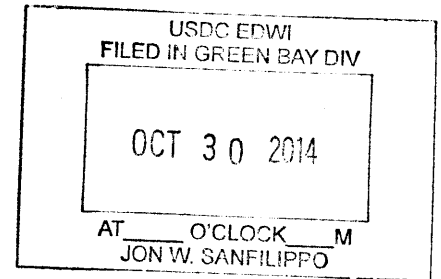


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

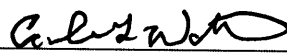
STEVEN P. LINK
(d.o.b. xx/xx/77)

CASE NUMBER: 14-M- 671

I, Sgt Carl Waterstreet, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. **Count One** On or about June 23, 2014, in the State and Eastern District of Wisconsin and elsewhere, **Steven P. Link** knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped and transported in and affecting interstate and foreign commerce; and which contained material which had been shipped, and transported by a means and facility of interstate and foreign commerce, including by computer. **Count Two** On or about June 27, 2014, in the State and Eastern District of Wisconsin and elsewhere, **Steven P. Link** knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped and transported in and affecting interstate and foreign commerce; and which contained material which had been shipped, and transported by a means and facility of interstate and foreign commerce, including by computer. **Count Three** On or about June 28, 2014, in the State and Eastern District of Wisconsin and elsewhere, **Steven P. Link** knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped and transported in and affecting interstate and foreign commerce; and which contained material which had been shipped, and transported by a means and facility of interstate and foreign commerce, including by computer. **Count Four** On or about June 25, 2014, in the State and Eastern District of Wisconsin and elsewhere, **Steven P. Link** knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped and transported in and affecting interstate and foreign commerce; and which contained material which had been shipped, and transported by a means and facility of interstate and foreign commerce, including by computer.

I further state that I am a Sergeant with the Sturgeon Bay Police Department, and this complaint is based on the following facts: Please see the attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant
Carl Waterstreet

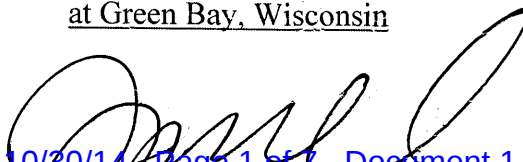
Sworn to before me and subscribed in my presence,

10/30/14

Date

at Green Bay, Wisconsin

The Honorable James R. Sickel
United States Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT

Carl Waterstreet, being first duly sworn, states that:

Background

1. I have been employed as a Sergeant with the Sturgeon Bay Police Department since May 2000. I have investigated criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have gained experience through training at seminars, classes, discussions with other knowledgeable agents and everyday work related to conducting these types of investigations. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. I am aware of the following federal statutes concerning child pornography:

a. 18 U.S.C. § 2252A(a)(2)(A) and (b)(1) prohibits a person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any child pornography or any material that contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

b. 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) prohibits a person from knowingly possessing or knowingly accessing with intent to view, or attempting or conspiring to do so, any material that contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed

or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

Basis for Information in Affidavit

3. The statements contained in this affidavit are based in part on the following: information provided by law enforcement officers from the Brown County Sheriff's Department and the Sturgeon Bay Police Department, both located in the State and Eastern District of Wisconsin, as well as my own investigation in this case. This affidavit includes only those facts that I believe are necessary to establish probable cause and does not include all of the facts uncovered during the investigation. Based on my investigation and the information supplied to me by other law enforcement personnel, I have probable cause to believe the following regarding Steven P. Link, dob XX/XX/77.

Facts Establishing Probable Cause

4. In June 2014, Lt. Jim Valley of the Brown County (Wisconsin) Sheriff's Department contacted Sturgeon Bay Police Department investigators concerning an individual in Sturgeon Bay who had child pornography available for download via the Emule network. Lt. Valley forwarded to investigators a movie file depicting an adult male and a female, approximately twelve-years of age having penis to vagina contact. The IP address for the Emule user resolved to Steven Link (36 years of age), 18 N. 3rd Avenue, Apt 2, Sturgeon Bay, WI. That apartment is located above a bookstore named "Untitled and Rare Used Books" that is owned and operated by Link. Later investigation revealed that the apartment was occupied by Kory C. Murphy.

5. Sturgeon Bay Police Department officers obtained a search warrant for both the apartment and the bookstore and executed it on September 5, 2014. Upon execution of that warrant, investigators recovered the following items from the “media room” of the bookstore: (1) Acer Aspire 7551 laptop computer; (2) External hard drive; (3) 8 channel DVR recorder with media storage capacity; (4) 16 channel DVR recorder with media storage capacity; (5) 16 GB thumb drive. Investigators also recovered an Acer Aspire desktop computer located on the front desk within the bookstore. Upon searching the upstairs apartment, believed to be occupied by Kory Murphy, investigators recovered several computer related items including an Acer Aspire 5733 laptop. A forensic preview was done of the above described items and movie and image files containing child pornography were identified. Steven Link was located in the bookstore and arrested. Kory Murphy was located in the apartment above the bookstore and was placed under arrest.

6. Following execution of the search warrants at the bookstore and upstairs apartment, investigators went that same day to the residence of Steven Link, located in Sturgeon Bay. Link resides at the premises with his fiancé, Katherine Johnson. Ms. Johnson was told that Link was arrested for possession of child pornography. She provided consent to investigators to search the premises for additional computer related storage devices. Ms. Johnson directed investigators to two computers and external hard drives, located in the master bedroom. Investigators recovered two 4-terabyte sized external hard drives. A forensic preview was conducted of both drives, one of which was found to contain numerous movie and image files of child pornography. Investigators seized the external hard drive containing the child pornography.

7. A forensic exam was later conducted on the above referenced items. Investigators determined that the Acer 7551 laptop, found in the media room, contained Emule file sharing software. A review of the Emule incoming folder, revealed approximately nine movie files containing child pornography obtained on September 4, 2014. Further examination of the Emule related files showed that approximately 200 movie files with names associated with child pornography were obtained and distributed to others on the Emule network. The Acer 7551 laptop is believed to be possessed by Link because investigators found his personal documents and photographs. Additionally, upon execution of the search warrant, Link was observed to close the screen of the laptop. Investigators also recovered various search terms used on the Emule network to include "11yo" "12yo" "14yo" "juliababby" and "preteen." Those search terms are commonly used to obtain child pornography files.

8. Investigators also reviewed the Western Digital "myBook" external hard drive recovered from Link's residence. The hard drive contained approximately 500 GB of child pornography movie and image files. The hard drive also contained movie files of Link engaged in sexual acts with other females and non-pornographic images of Link's fiancé and daughter. It further contained hundreds of movie files primarily depicting young adult females using the public restroom within the book store. Given the file path observed, investigators believe that Link would attach the external hard drive to the Acer 7551 laptop in order to obtain child pornography movie and image files obtained via Emule. The files on the external hard drive were organized within a vast folder structure. More specifically, the following movie and image files are just a small number of the movie and image files that were recovered and determined to have been received and/or distributed via the Emule program:

a. *34 (Sdpa)-Jessica-Christ-11yr-Bro Fuks 11 yo Sis-Pthc.avi*- a movie file depicting a 12 year old female, naked from the waist down, exposing her vagina and anus and then an adult male having penis to vagina contact with her. This movie file was distributed on June 23, 2014, to Detective Jim Valley, who was working in an undercover capacity. That movie file was located on the external hard drive located at Link's residence.

b. *yoBoy-Man-Tara-Boil-Moscow-11yo-And-Dad-Hard-Deep-Anal-Doggstyle-4wasy-Fingers-Sucking-and -Cumshot_On-Face-Unmasked.wmv*- a movie file containing an adult male having sexual intercourse with an approximate 11-year old female. The minor female then performs oral sex on the male who then ejaculates on her face. This file was received via the Emule network on June 27, 2014 and records associated with that file show it was offered for distribution via the Emule network that same day.

c. *2014 Pedo Film_0017 9yo Girl mit 16yo Sister.avi*-a movie file containing a pre-pubescent, approximate 9-year old female, naked from the waist down, and an adult female. The adult female touches the vaginal area of the minor female and inserts an object into the minor females' vagina. This file was obtained via Emule on June 28, 2014 and offered for distribution via Emule that same day.

d. *Fantasia Models-Frifam 2010 9yo-Suziq-Wants it in-ol.avi*- a movie file containing a minor female, approximately 8 years of age, and an adult male. The minor female touches the male's penis and the male then engages in sexual intercourse with the minor female. This file was received via Emule on June 25, 2014 and offered it for distribution the following day.

9. Steven Link was present during the search and was told that investigators were searching for child pornography. Link said he used both the Emule network and Bit Torrent to download movies but not pornography. Link told investigators that he had been secretly recording customers who were using the public bathroom at the bookstore as well as a downstairs bedroom that also contained a massage table. Investigators found multiple hidden cameras in the basement of the bookstore as well as the public bathroom.

10. Investigators made contact with Murphy during execution of the search warrant on the upstairs apartment. Murphy said that he used the Bit Torrent network but not Emule. Murphy denied having any pornographic material on his computer.

11. Based upon the foregoing information, I believe there is probable cause to believe that Steven Link received, distributed, and possessed image and movie files containing child pornography in violation of 18 U.S.C. § 2252A(a) on the above referenced dates. Further, the image and movie files were transported using a means and facility of interstate commerce, including by computer.


Affiant Carl Waterstreet

Subscribed and sworn to before me
this 30 day of Oct, 2014.


Notary Public

My commission expires: 12/31/15.